

WOLFBLOCK LLP
250 Park Avenue
New York, NY 10177
Telephone: (212) 986-1116
Facsimile: 212-986-0604
James J. Vincequerra, Esquire
Gretchen M. Santamour, Esquire

Attorneys for Simpson Senior Services

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS HOLDINGS INC., et al.,

Debtors.

:
:
:
:
: **Chapter 11 Case No.**
:
: **08-13555 (JMP)**
:
: **(Jointly Administered)**
:
:

**MOTION FOR ADMISSION OF
GRETCHEN M. SANTAMOUR TO PRACTICE, *PRO HAC VICE***

James J. Vincequerra ("**Movant**"), a member in good standing of the Bar of the State of New York, hereby moves this Court to enter an order permitting Gretchen M. Santamour to practice *pro hac vice* before The Honorable James M. Peck in the United States Bankruptcy Court for the Southern District of New York and to represent Jenner's Pond Inc. and Simpson Meadows ("**Creditors**"), creditors of the above-referenced Debtor, pursuant to Local Rule 2090-1(b) of the United States Bankruptcy Court for the Southern District of New York (the "**Local Rule**"). In support of this Motion, Movant states as follows:

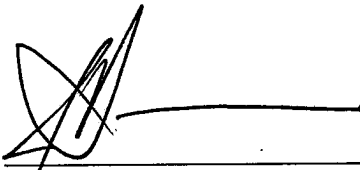
Ms. Santamour is a member in good standing of the bar of the Commonwealth of Pennsylvania and the bars of the U.S. District Courts for the Eastern and Middle Districts of Pennsylvania. There are no disciplinary proceedings pending in any court against her.

In support of this Motion, attached as **Exhibit "A"** is the certification of Ms. Santamour pursuant to the Local Rule.

Movant requests that this Court approve this Motion in order that Ms. Santamour may file pleadings and appear and be heard at hearings in these chapter 11 proceedings.

WHEREFORE, Movant respectfully requests that the Court enter the attached Order permitting Gretchen M. Santamour to appear *pro hac vice* in association with Movant, as counsel to Simpson in these chapter 11 proceedings.

Dated: November 24, 2008



James J. Vincequerra (JV-6270)
for WolfBlock LLP
Attorneys for Simpson Senior Services

EXHIBIT "A"

I, Gretchen M. Santamour, hereby certify that:

I am eligible for admission to this Court,

I am admitted to practice in the jurisdictions specified in the Motion, and am in good standing in such jurisdictions;

I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the course of these chapter 11 proceedings; and

I have access to, or have acquired a copy of the Local Rules of this Court and am generally familiar with such Rules.

My address is: WolfBlock LLP
1650 Arch Street, 22nd Floor
Philadelphia, PA 19103-2097

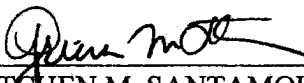
My e-mail address is: gsantamour@wolfblock.com

My fax number is: (215) 405-3907

My telephone number is: (215) 977-2467

I agree to pay the fee of \$25 upon entry of an order admitting me to practice *pro hac vice*.

Dated: November 24, 2008



GRETCHEN M. SANTAMOUR, ESQUIRE
WolfBlock LLP
Attorneys for Simpson

WOLFBLOCK LLP
250 Park Avenue
New York, NY 10177
Telephone: (212) 986-1116
Facsimile: 212-986-0604
James J. Vincequerra, Esquire
Gretchen M. Santamour, Esquire

Attorneys for Simpson Senior Services

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: : **Chapter 11 Case No.**
:
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
:
Debtors. : **(Jointly Administered)**
:

ORDER OF ADMISSION TO PRACTICE, *Pro Hac Vice*

Upon the motion for entry of an order granting Gretchen M. Santamour admission to represent **Simpson Senior Services** and practice *pro hac vice* before The Honorable James M. Peck in the United States Bankruptcy Court for the Southern District of New York, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED, that **Gretchen M. Santamour, Esquire**, is admitted to practice, *pro hac vice*, in the above-referenced case before the United States Bankruptcy Court, Southern District of New York, subject to payment of the filing fee.

Dated: _____, 2008
New York, New York

/s/ _____
THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

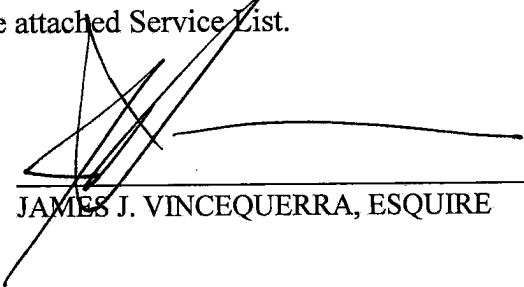
**LEHMAN BROTHERS HOLDINGS INC., et al.,

Debtors.**

:
:
:
:
: **Chapter 11 Case No.**
:
: **08-13555 (JMP)**
:
: **(Jointly Administered)**
:
:

CERTIFICATION OF SERVICE/MAILING

I, James J. Vincequerra, Esquire, do hereby certify that on the 24th day of November, 2008, a copy of the foregoing MOTION FOR ADMISSION OF GRETCHEN M. SANTAMOUR TO PRACTICE *Pro Hac Vice* was served either electronically or via U.S. First Class Mail, postage prepaid, upon the parties on the attached Service List.



JAMES J. VINCEQUERRA, ESQUIRE

Dated: November 24, 2008

SERVICE LIST

Harvey R. Miller

Weil, Gotshal & Manges, LLP
767 Fifth Avenue
New York, NY 10153

Shai Waisman

Weil, Gotshal & Manges, LLP
767 5th Avenue
New York, NY 10153

Andrew D. Velez-Rivera

Office of the U.S. Trustee
33 Whitehall Street
21st. Floor
New York, NY 10004

James Tecce

Quinn Emanuel Urquhart Oliver & Hedges
51 Madison Avenue, 22nd Floor
New York, NY 10010

Susheel Kirpalani

Quinn Emanuel Urquhart Oliver & Hedges
51 Madison Avenue, 22nd Floor
New York, NY 10010

Jacqueline Marcus

Weil Gotshal & Manges, LLP
767 5th Avenue
New York, NY 10153

Jeffrey S. Margolin

Hughes Hubbard & Reed
1 Battery Park Plaza
New York, NY 10004

Claims and Noticing Agent

Epiq Bankruptcy Solutions, LLC Claims Agent

(f/k/a Bankruptcy Services LLC)
757 Third Avenue, 3rd Floor
New York, NY 10017

Susheel Kirpalani

Quinn Emanuel Urquhart Oliver & Hedges
51 Madison Avenue, 22nd Floor
New York, NY 10010

United States Trustee

33 Whitehall Street
21st Floor
New York, NY 10004